

**From:** [Sheldrake, Sean](#)  
**To:** ["Peterson, Lance"](#)  
**Subject:** RE: comment #36 on hot spots, gasco BODR letter (sf)  
**Date:** Thursday, November 2, 2017 10:03:00 AM  
**Attachments:** [image001.png](#)  
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[image007.png](#)  
[image008.png](#)  
[image009.png](#)

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Lance, thanks for pointing that out. AT our next meeting, we should definitely remind them of that.  
S

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**From:** Peterson, Lance [mailto:PetersonLE@cdmsmith.com]  
**Sent:** Wednesday, November 01, 2017 4:06 PM  
**To:** Sheldrake, Sean <sheldrake.sean@epa.gov>  
**Subject:** FW: comment #36 on hot spots, gasco BODR letter (sf)

Sean, as written in EPA's letter to NW Natural ("EPA has decided to retract the three comments requested by NW Natural; specifically, general comment 2 and specific comment 34 which deal with Final Project area definition and those portions of specific comment 36 that deal with Oregon state hot spots of contamination.") only the last two sentences of comment 36 would be affected. The rest of the comment stands and that should be clear to NW Natural.

Lance

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**From:** BAYUK Dana [mailto:Dana.BAYUK@state.or.us]  
**Sent:** Wednesday, November 01, 2017 3:51 PM  
**To:** 'Sheldrake, Sean' <[sheldrake.sean@epa.gov](mailto:sheldrake.sean@epa.gov)>  
**Cc:** MCCLINCY Matt <[Matt.MCCLINCY@state.or.us](mailto:Matt.MCCLINCY@state.or.us)>; Peterson, Lance <[PetersonLE@cdmsmith.com](mailto:PetersonLE@cdmsmith.com)>; GREENFIELD Sarah <[Sarah.GREENFIELD@state.or.us](mailto:Sarah.GREENFIELD@state.or.us)>  
**Subject:** RE: comment #36 on hot spots, gasco BODR letter (sf)

Afternoon Sean.

I appreciate your heads up on removing Comment #36 from the comments set. DEQ does have some concerns about excluding the comment because of references made to “hot spots.” I’ve inserted the entire comments below, and highlighted the portion related to hot spots.

**3.1, Presence of Principal Threat Waste, page 7, last paragraph:** The last sentence of this section which reads “As discussed in Section 3.4, the three forms of PTW are not used for evaluation of the Final Project Area in the riverbank.” This topic does not appear to be discussed in Section 3.4. For clarification, the riverbank is within the Interim Project Area (see comment to “Section 3.4 Riverbank, page 9” below). The three forms of PTW (PTW-NAPL, PTW-Highly Toxic, PTW-NRC) should be factors in determining the boundaries of the Final Project Area inclusive of the riverbank. Section 4.4. acknowledges that the nature and extent of riverbank PTW-NAPL is a factor in this regard. In addition to PTW identified in the ROD, Oregon state hot spots of contamination associated with the riverbank should be included in the evaluation to ensure the state’s interests are considered. The boundaries of PTW and hot spots on and below the riverbank should be compared to support project planning.

DEQ’s intent was to include the boundaries of hot spots along with PTW because the riverbank is where the uplands and in-water remedies merge. We see incorporating hot spots and PTW into the planning and design process as a way of aligning a shared RAO which is to address the most contaminated material on, within, and below the riverbank. Given the scale of the project area, we think it’s unlikely there would be significant differences between the hot spot and PTW boundaries on the riverbank, but also believe if differences occur that have the potential to influence design, then the design should address the larger of the areas identified.

We’re also wondering if the scope of agreements between EPA and DEQ is being expanded beyond the original intent. We recall an agreement being reached that state hot spot criteria would not be applied to sediment contamination. We’re not sure an agreement was reached regarding hot spots on riverbanks. That said, for purposes of aligning uplands and in-water remedies we’re going to consider hot spots and PTW boundaries in the uplands FS for comparison and planning purposes.

If after considering our comments EPA elects to retract the comment, DEQ recommends only removing the last two sentences that actually refer to hot spots. We think the rest of the comment remains valid.

Thanks again for the heads up. Please let me know if you have questions or want to discuss this e-mail further.

Dana

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**From:** Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]  
**Sent:** Wednesday, November 01, 2017 12:00 PM  
**To:** BAYUK Dana  
**Cc:** GREENFIELD Sarah; MCCLINCY Matt  
**Subject:** comment #36 on hot spots, gasco BODR letter (sf)

Hi Dana, just to let you know, we probably need to retract #36--since it wasn't an ARAR in our ROD.  
Let me know if you all have any concerns on this.

Back to hazwoper!

Thank you.

S

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